UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS AMARILLO DIVISION

RONNY L. JACKSON, et al.)
V.	Plaintiffs)) No. 2:22-cv-241
JOSEPH R. BIDEN, JR et al.)
	Defendants.)))

CONSENT MOTION FOR LEAVE TO FILE BRIEFS WITH EXTENDED PAGE LIMITS AND FOR A REVISED BRIEFING SCHEDULE

Pursuant to Local Rules 7.1(e), (f), & 7.2(c), Defendants move for this Court to extend Defendants' page limits for their forthcoming motion to dismiss Plaintiffs' complaint by 15 pages, Plaintiffs' Response thereto by 15 pages, and Defendants' subsequent Reply by 10 pages. Plaintiffs' consent to this request. After conferring, the parties also propose a revision in the current briefing schedule to allow Plaintiffs additional time to respond to Defendants' forthcoming motion and additional time for reply. The grounds for these requests are set forth below.

- 1. Plaintiffs' Complaint challenges the United States' aid to the West Bank and Gaza as in alleged violation of the Taylor Force Act, Pub. L. 115–141, div. S, title X, 132 Stat. 1143 (Mar. 3, 2018). The Complaint was filed on December 20, 2022, and, pursuant to the Court's March 6th Order granting Defendants' Motion for an Extension of time to File an Answer, Defendants' current deadline to answer or otherwise respond to the complaint is April 10, 2023.
- 2. Defendants plan to file a motion to dismiss Plaintiffs' complaint by the April 10, 2023, deadline. Under Local Rule 7.2(c), Defendants' brief in support of their motion and Plaintiffs' brief in opposition thereto may not exceed 25 pages, and Defendants' reply may not exceed 10 pages. Defendants request an additional 15 pages for their opening motion in order to fully and adequately

address several potential grounds for dismissal, including threshold issues of standing for which

Defendants believe the Court would benefit from a fuller discussion of the issues. Plaintiffs consent

to this requested extension in exchange for an additional 15 pages to oppose Defendants' motion, and

Plaintiffs also consent to an additional 10 pages for Defendants to reply.

3. Accordingly, Defendants request (with Plaintiffs' consent) that the Court increase the page

limit for Defendants' forthcoming motion to dismiss from 25 pages to 40 pages, Plaintiffs' opposition

thereto from 25 pages to 40 pages, and Defendants' Reply from 10 to 20 pages.

4. The parties also request an enlargement of time for Plaintiffs to respond to the Defendants'

motion to dismiss by 14 days and for Defendants to file a Reply by 7 days. Under this revised schedule,

Plaintiffs' deadline to respond to Defendants' forthcoming motion to dismiss would be extended to

May 15, 2023, and Defendants' deadline to reply to Plaintiffs' opposition would be extended to June

5, 2023.

5. The parties thank the Court for its consideration of this request.

Dated: April 4, 2023

Respectfully submitted,

BRIAN M. BOYNTON

Principal Deputy Assistant Attorney General

ANTHONY J. COPPOLINO

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/s/ Samuel Rebo

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CERTIFICATE OF SERVICE

I hereby certify that on April 4, 2023, I electronically filed this brief with the Clerk of the Court

for the United States District Court for the Northern District of Texas by using the CM/ECF system.

Counsel in the case are registered CM/ECF users and service will be accomplished by the CM/ECF

system.

<u>/s/ Samuel Rebo</u>

SAMUEL REBO

U.S. Department of Justice

CERTIFICATE OF CONFERENCE

I certify that on April 4, 2023, undersigned counsel conferred with counsel for Plaintiffs regarding this motion pursuant to Local Civil Rule 7.1. Plaintiffs do not oppose Defendants' motion.

/s/ Samuel Rebo SAMUEL REBO